

Dear Agvet Review team

Pollution from agricultural chemicals in Australia is increasing and this is a problem for persistent and bioaccumulating agvet products. There is only so much dilution of agvet chemical pollution a natural system can do before harms emerge due to overuse.

I think the present agvet reforms are valuable as they now allow for some refinement in terms of levy allocation and collection. My suggestion is that in order to address agvet chemical pollution and toxicity issues, a proportion of the levy should be allocated by law to pollution prevention and agvet chemical toxicity reduction work. Along these lines, the levy could be scaled according to the toxicity and pollution profile of the product registered. For example, if the product is found in waterways as a pollutant, and if it is costly for water companies to eliminate the chemical, or render their water safe to drink, then this product should attract a higher 'toxicity' or 'pollution' levy rate. It is in the public interest to do so.

I appreciate that government does not like to interfere with the operation of businesses engaged in the sale of agvet chemicals and that government wants to minimise red tape, however, in this instance, there is a public interest in reducing pollution caused by the use of agvet chemicals, as well as the toxicity of chemicals used in agriculture and amenity horticulture. Presently there is no Federal or state agency tasked with designing or overseeing pollution or toxicity reduction measures with respect to agvet chemicals. Agvet chemicals are exempted from being considered pollutants by state agencies. Similarly, agvet chemicals are exempted from toxicity control under state health laws as they are approved for use by the APVMA. This glaring gap in oversight with respect to the environmental and health stewardship of agvet chemicals places the 'duty of care' squarely with the APVMA.

If the agvet chemical industry is serious about maintaining the social license for the use of agvet chemicals that land up in the environment (in waterways, in the air, on the land adjoining farms, etc.) then something needs to be done from a legislative point of view to encourage manufacturers to sell products that have less environmental impact. The levy offers a mechanism to do this. I believe my suggestion could be easily incorporated into the revised legislation you are seeking comment on and I thank you in advance for considering my suggestion.